

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: Chapter 11

FTX TRADING LTD., *et al.*,¹ Case No. 22-11068 (JTD)

Debtors. (Jointly Administered)

Ref. No. __

**ORDER SUSTAINING DEBTORS' FORTY-FIRST (NON-SUBSTANTIVE)
OMNIBUS OBJECTION TO CERTAIN
SUPERSEDED CLAIMS (CUSTOMER CLAIMS)**

Upon the forty-first omnibus objection (the “Objection”)² of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), for entry of an order (this “Order”) sustaining the Objection and disallowing and expunging in their entirety the Superseded Claims set forth in Schedule 1 attached hereto; and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Superseded Claim set forth in Schedule 1 attached hereto is disallowed and expunged in its entirety. The claims listed in the column titled “Surviving Claims” identified on Schedule 1 attached hereto shall remain on the claims register, subject to the Debtors’ further objections on any substantive or non-substantive grounds.
3. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors’ right to object on any other grounds that the Debtors discover is preserved.
4. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any Superseded Claims referenced or identified in the Objection that is not listed on Schedule 1 attached hereto.
5. To the extent a response is filed regarding any Superseded Claim, each such Superseded Claim, and the Objection as it pertains to such Superseded Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order

will be deemed a separate order with respect to each Superseded Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

6. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtor may have to enforce rights of setoff against the claimants.

8. Nothing in the Objection or this Order, nor any actions or payments made by the Debtor pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

10. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: _____
Wilmington, Delaware

The Honorable John T. Dorsey
United States Bankruptcy Judge

SCHEDULE 1

Superseded Claims

FTX Trading Ltd. 22-11068 (JTD)
Forty-First Omnibus Claims Objection
Schedule 1 - Superseded Claims

Claim Number	Claims to be Disallowed				Surviving Claims				
	Name	Debtor	Filed Amount	Claim Number	Name	Debtor	Tickers	Ticker Quantity	
2724	Name on file	FTX Trading Ltd.	\$5,297,487.81	55186	Name on file	FTX Trading Ltd.	1INCH-PERP	0.0000000000000000	
							ADA-PERP	0.0000000000000000	
							AMPL	0.000000003990687	
							AVAX	0.076710287399540	
							AVAX-0624	0.0000000000000000	
							AVAX-0930	0.0000000000000000	
							AVAX-PERP	0.0000000000000000	
							BAL-PERP	0.0000000000000000	
							BCH-PERP	0.0000000000000000	
							BNB	0.00160422795460	
							BNB-0624	0.0000000000000000	
							BNB-0930	0.0000000000000000	
							BNB-PERP	0.0000000000000000	
							BSV-PERP	0.0000000000000000	
							BTC-1230	0.0000000000000000	
							BTC-PERP	0.0000000000000000	
							CEL	0.011326810551982	
							CEL-0624	0.0000000000000000	
							CEL-0930	0.0000000000000000	
							CEL-PERP	0.0000000000000000	
							COMP-PERP	0.0000000000000000	
							CREAM-PERP	0.0000000000000000	
							CRV-PERP	0.0000000000000000	
							CVX-PERP	0.0000000000000000	
							DOGE-PERP	0.0000000000000000	
							DOT	0.019024079984980	
							DOT-0624	0.0000000000000000	
							ETH	0.000200000645276	
							ETH-0331	0.0000000000000000	
							ETH-0930	0.0000000000000000	
							ETH-1230	0.0000000000000000	
							ETH-PERP	0.0000000000000000	
							EXCH-PERP	0.0000000000000000	
							FTM-PERP	0.0000000000000000	
							FTT	1,000.0850000000000000	
							FTT-PERP	100,000.0000000000000000	
							HT-PERP	0.0000000000000000	
							LDO-PERP	0.0000000000000000	
							LEO-PERP	0.0000000000000000	
							LTC-PERP	0.0000000000000000	
							LUNC-PERP	0.0000000000000000	
							MKR	0.0025000000000000	
							MKR-PERP	0.0000000000000000	
							OKB-PERP	0.0000000000000000	
							OMG-PERP	0.0000000000000000	
							PRIV-PERP	0.0000000000000000	
							SLND	0.0030310000000000	
							SNX	0.000000006682170	
							SOL	0.00115743100030	
							SOL-0624	0.0000000000000000	
							SOL-0930	0.0000000000000000	
							SOL-1230	0.0000000000000000	
							SOL-PERP	0.0000000000000000	
							SRM	2.2540899400000000	
							SRM_LOCKED	168.02433692000000	
							SXP-PERP	0.0000000000000000	
							THETA-PERP	0.0000000000000000	
							TRX	185,101.0000000000000000	
							TRX-PERP	0.0000000000000000	

Claim Number	Claims to be Disallowed				Surviving Claims			
	Name	Debtor	Filed Amount	Claim Number	Name	Debtor	Tickers	Ticker Quantity
							USD	5,244,405.300883154763209
							USDC	20,000.0000000000000000
							USDT	19,999.932235877677000
							USTC-PERP	0.0000000000000000
							VET-PERP	0.0000000000000000
							XRP-PERP	0.0000000000000000
							YFI-PERP	0.0000000000000000
							ZRX-PERP	0.0000000000000000
85329	Name on file	FTX Trading Ltd.	\$0.00	25119**	Name on file	FTX Trading Ltd.	BTC	0.000002850000000
							USD	103,397.4000000000000000
85331	Name on file	FTX Trading Ltd.	\$0.00	36428*	Name on file	FTX Trading Ltd.	BTC	0.000002720000000
							USD	103,813.6300000000000000
							USDT	0.004058700000000
384	Name on file	FTX Trading Ltd.	\$1,004,393.00	91605	Name on file	FTX Trading Ltd.	1INCH-PERP	0.0000000000000000
							AAVE-PERP	0.000000000000081
							ADA-PERP	0.0000000000000000
							ALGO-PERP	0.0000000000000000
							ANC-PERP	0.0000000000000000
							APE-PERP	-0.0000000000000937
							APT-PERP	0.0000000000000000
							ASD-PERP	0.0000000000000000
							ATLAS-PERP	0.0000000000000000
							ATOM	0.0000000008097103
							ATOM-PERP	0.000000000000611
							AVAX	0.0000000001519323
							AVAX-PERP	-0.0000000000001250
							AXS-PERP	-0.000000000000014
							BAL-PERP	-0.000000000000483
							BAT-PERP	0.0000000000000000
							BNB-PERP	-0.000000000000021
							BTC	0.000000000200000
							BTC-PERP	0.0000000000000000
							C98-PERP	0.0000000000000000
							CEL	0.000000000415414
							CEL-PERP	0.0000000000000000
							CHZ-PERP	0.0000000000000000
							COMP-PERP	0.000000000000115
							CREAM-PERP	0.0000000000000000
							CRV-PERP	0.0000000000000000
							CVX-PERP	0.0000000000000000
							DOGE-PERP	0.0000000000000000
							DOT-PERP	-0.0000000000000454
							DYDX-PERP	0.0000000000001456
							EOS-PERP	-0.000000000000909
							ETH	0.0000000004003400
							ETH-0930	-0.000000000000003
							ETH-PERP	0.000000000000012
							FIL-PERP	0.000000000000682
							FLM-PERP	-0.000000000007275
							FLOW-PERP	0.0000000000000000
							FTM-PERP	0.0000000000000000
							FTT-PERP	-0.000000000000341
							FXS-PERP	0.0000000000000056
							GALA-PERP	0.0000000000000000
							GLMR-PERP	0.0000000000000000
							HNT-PERP	0.000000000000170
							HT-PERP	0.0000000000000000
							ICP-PERP	-0.000000000000227
							JASMY-PERP	0.0000000000000000
							KAVA-PERP	0.0000000000000000
							KNC-PERP	0.0000000000000000

*Surviving Claim is also included as a Surviving Claim in the Debtors' Fortieth (Substantive) Omnibus Objection to Certain Substantive Duplicate Proofs of Claim (Customer Claims)

**Surviving Claim is also included as a Surviving Claim in the Debtors' Thirty-Ninth (Non-Substantive) Omnibus Objection to Certain Superseded Proofs of Claim (Customer Claims)

Claim Number	Claims to be Disallowed				Surviving Claims				
	Name	Debtor	Filed Amount	Claim Number	Name	Debtor	Tickers	Ticker Quantity	
					KSM-PERP		0.0000000000000000		
					LDO-PERP		0.0000000000000000		
					LEO		0.000000000933714		
					LEO-PERP		0.0000000000000000		
					LINA-PERP		0.0000000000000000		
					LINK-PERP		-0.000000000000015		
					LOOKS-PERP		0.0000000000000000		
					LTC-PERP		0.0000000000000000		
					LUNC-PERP		0.0000000000000000		
					MANA-PERP		0.0000000000000000		
					MATIC		0.0000000010000000		
					MATIC-PERP		0.0000000000000000		
					MINA-PERP		0.0000000000000000		
					MKR-PERP		0.000000000000010		
					MNGO-PERP		0.0000000000000000		
					NEAR-PERP		0.0000000000001818		
					NEO-PERP		-0.000000000000468		
					OKB		0.000000003742869		
					OKB-PERP		0.000000000000042		
					OMG-PERP		0.0000000000000000		
					ONE-PERP		0.0000000000000000		
					OP-PERP		0.0000000000000000		
					POLIS-PERP		0.0000000000000000		
					RAY		0.000000008942303		
					RAY-PERP		0.0000000000000000		
					REN		0.000000008353747		
					REN-PERP		0.0000000000000000		
					RON-PERP		0.0000000000000000		
					ROSE-PERP		0.0000000000000000		
					RSR-PERP		0.0000000000000000		
					RUNE		0.000000006823295		
					RUNE-PERP		0.000000000000003		
					SAND-PERP		0.0000000000000000		
					SHIB-PERP		0.0000000000000000		
					SLP-PERP		0.0000000000000000		
					SNX-PERP		0.0000000000001477		
					SOL-PERP		0.0000000000000458		
					SRM		11.03983202000000		
					SRM_LOCKED		218.27459151000000		
					SRM-PERP		0.0000000000000000		
					STEP-PERP		0.0000000000000000		
					STORI-PERP		0.0000000000003808		
					SUSHI		0.000000001560951		
					SUSHI-PERP		0.0000000000000000		
					THETA-PERP		0.0000000000000909		
					TLM-PERP		0.0000000000000000		
					TRX		0.000000007861434		
					TRX-PERP		0.0000000000000000		
					UNI-PERP		0.0000000000000390		
					USD		1,004,393.000000000000		
					USDT		0.000000004938029		
					USTC-PERP		0.0000000000000000		
					XAUT		0.000000003413591		
					XAUT-PERP		0.0000000000000000		
					XRP-PERP		0.0000000000000000		
					YFI		0.000000004083418		
					YFI-PERP		0.0000000000000000		
3002	Name on file	Cottonwood Grove Ltd	\$15,136,000.00	78947	Name on file	FTX Trading Ltd.	1INCH	168,824,5085000000000000	
							1INCH-PERP	-808,0000000000000000	
							ADA-PERP	-16,657,0000000000000000	
							ALEPH	47,279,8575000000000000	
							ALGO	3,390,578,8783000000000000	
							ALGO-PERP	-17,301,0000000000000000	

Claim Number	Claims to be Disallowed			Surviving Claims				
	Name	Debtor	Filed Amount	Claim Number	Name	Debtor	Tickers	Ticker Quantity
				ANC				19,521.4943000000000000
				APE				1,588.7198300000000000
				APE-1230				0.0000000000000000
				APE-PERP				-1,341.299999998710000
				APT				759,689.656100000000000
				APT-PERP				18.0000000000000000
				ATLAS				1,915,880.853000000000000
				ATOM				1,496.284120000000000
				ATOM-1230				0.0000000000000000
				ATOM-PERP				753.960000000000000
				AUDIO				1,136,529.860500000000000
				AURY				53,293.603700000000000
				AVAX				43,709.549859890000000
				AVAX-0930				0.0000000000000000
				AVAX-1230				13.799999999999600
				AVAX-PERP				351.400000000126000
				AXS				2,526.502950000000000
				AXS-1230				0.0000000000000000
				AXS-PERP				202.000000000000000
				BAND-PERP				-149.399999999996000
				BAR				36,894.966300000000000
				BCH				394,492313000000000
				BCH-1230				2.257000000000010
				BCH-PERP				-253.704999999968000
				BICO				2,079,532.753300000000000
				BIT				207,224.173300000000000
				BNB				1,501.685760500000000
				BNB-1230				0.0000000000000000
				BNB-PERP				-164.199999999990000
				BSV-PERP				40.53999999972700
				BTC				2,233.066030134319600
				BTC-0325				0.0000000000000000
				BTC-0331				0.0000000000000001
				BTC-0624				0.0000000000000000
				BTC-0930				0.0000000000000000
				BTC-1230				-0.89800000000513
				BTC-20210326				0.0000000000000000
				BTC-20210625				0.0000000000000000
				BTC-20210924				0.0000000000000000
				BTC-20211231				0.0000000000000000
				BTC-PERP				-0.67609999999993
				CHZ				9,132,018.125865560000000
				CHZ-PERP				-86,590.000000000000000
				CITY				35,464.500180000000000
				COMP-PERP				-31.17939999980300
				CONV				6,019,434.245500000000000
				CRO-PERP				-23,490.000000000000000
				CRV-PERP				-19,369.000000000000000
				DFL				35,269,188.477000000000000
				DMG				1,966,938.907000000000000
				DOGE				3,627,119.066350000000000
				DOGE-0325				0.0000000000000000
				DOGE-0624				0.0000000000000000
				DOGE-1230				0.0000000000000000
				DOGE-20210924				0.0000000000000000
				DOGE-20211231				0.0000000000000000
				DOGE-PERP				-312,567.000000000000000
				DOT				20,388.307710000000000
				DOT-0930				0.0000000000000000
				DOT-1230				0.0000000000000000
				DOT-PERP				-3,496.100000000000000
				ENJ-PERP				-849.000000000000000
				EOS-PERP				1,217.79999995440000

Claim Number	Claims to be Disallowed			Surviving Claims				
	Name	Debtor	Filed Amount	Claim Number	Name	Debtor	Tickers	Ticker Quantity
					ETC-PERP		-295.599999999767000	
					ETH		5,946.823915000000000	
					ETH-0325		0.000000000000000	
					ETH-0331		-0.517000000000141	
					ETH-0624		0.000000000000000	
					ETH-0930		0.000000000000000	
					ETH-1230		-14.570000000006200	
					ETH-20210625		0.000000000000000	
					ETH-20210924		0.000000000000000	
					ETH-20211231		0.000000000000000	
					ETH-PERP		-31.262000000000100	
					ETHW		4,734.2147691000000	
					ETHW-PERP		-90.900000000033300	
					EUL		105,578.524990000000000	
					FIL-PERP		-720.799999999347000	
					FTM		531,198.104400000000000	
					FTM-1230		0.000000000000000	
					FTM-PERP		-10,858.000000000000000	
					FTT		23,430.548630000000000	
					FTT-PERP		189.99999999701000	
					GALA-PERP		35,430.000000000000000	
					GALFAN		5,661.616550000000000	
					GRT-PERP		56,816.000000000000000	
					HMT		49,271.266400000000000	
					HT-PERP		808.370000000034000	
					HXRO		1,864,238.785958160000000	
					INTER		25,174.032430000000000	
					JOE		590,547.103900000000000	
					KLUNC-PERP		-9,555.000000000000000	
					KSHIB-PERP		1,355,715.000000000000000	
					LDO		549,111.058049020000000	
					LEO		338,473.824200000000000	
					LINA		14,137,506.560500000000000	
					LINK		13,368.855939000000000	
					LINK-1230		0.000000000000000	
					LINK-PERP		2,728.600000000990000	
					LOOKS		690.370900000000000	
					LRC-PERP		-58,252.000000000000000	
					LTC		1,269.650103000000000	
					LTC-PERP		120.420000000000000	
					LUNA2		12,172.212720137000000	
					LUNA2_LOCKED		80,101.641910319000000	
					LUNC		635,721.520435000000000	
					LUNC-PERP		368,000.000018107000000	
					MANA		1,411.000000000000000	
					MANA-PERP		25,792.000000000000000	
					MAPS		59,525.000000000000000	
					MASK		108,149.298500000000000	
					MATIC		4,342,409.835850000000000	
					MATIC-1230		0.000000000000000	
					MATIC-PERP		-11,167.000000000000000	
					MKR-PERP		-1.104000000000500	
					MPLX		10,278,465.632200000000000	
					NEAR-PERP		-109.199999999253000	
					NFT			
					(446940456354878638/MAG			
					IC EDEN PASS)		1.000000000000000	
					NFT			
					(569854432628478700/OFFI			
					CIAL SOLANA NFT)		1.000000000000000	
					OKB-PERP		11.329999999997600	
					OMG		28.047200000000000	
					OMG-PERP		-4,860.100000000000000	

Claim Number	Claims to be Disallowed				Surviving Claims			
	Name	Debtor	Filed Amount	Claim Number	Name	Debtor	Tickers	Ticker Quantity
2342	Name on file	FTX EU Ltd.	\$0.00	91462*	Name on file	FTX EU Ltd.	AKRO	1.0000000000000000
							AUDIO	991.96722109000000
							AVAX	10.51957762000000
							AXS	59.03200970000000
							BAO	5.00000000000000
							BTC	0.08658413000000
							CRO	5,993.18836743000000
							DENT	1.00000000000000
							DOT	20.30216727000000
							ETH	1.73968075000000
							ETHW	70.40355440000000
							EUR	0.004412512816541
							FTT	102.51743115000000
							GST	3,974.30379540000000
							KIN	4.00000000000000
							RSR	3.00000000000000
							SPELL	856,344.36803728000000
							TRX	1.00000000000000
							UBXT	2.00000000000000

Claim Number	Claims to be Disallowed			Claim Number	Surviving Claims			
	Name	Debtor	Filed Amount		Name	Debtor	Tickers	Ticker Quantity
						USD		0.0292526000000000